## IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF TENNESSEE

IN RE:	
HANOVER CORPORATION, LLC,	)
Debtor	) CHAPTER 7
One Lakeview Place	) CASE NO. 06-06087-KI
25 Century Blvd., Ste. 208	)
Nashville, TN 37214	)

## AMENDED MOTION TO WITHDRAW UNCLAIMED FUNDS

Now Comes Max Bryant, partial Heir to the Estate of Elsie Bryant, and amends his original motion directing the Clerk to remit unclaimed funds of Elsie Bryant. In support of this amended motion Movant will show the Court that:

- 1. An Allowed Proof of Claim was filed in the above referenced case for the Estate of Elsie Bryant who died intestate on 1/24/2008.
- 2. This Court deposited \$6,697.21 into the Registry of the Court as unclaimed funds for the Estate of Elsie Bryant.
- 3. That at the time of death my mother, Elsie Bryant was a widow and had two (2) living children who were the only heirs at law of her estate.
- 4. That I, Max Bryant, and my sister Beverly Cochran, were the only heirs at law at the time of my mother death.
- 5. That pursuant to the laws of Intestate Distribution of the State of Tennessee I am entitled to ½ of her Personal Property, including any distribution of unclaimed funds from this Court.
- 6. Applicant further certifies that he has conducted a reasonable investigation and the funds sought have not been paid to the Creditor (Claimant) or to any agent on the Creditor's behalf.
- 7. That the Applicant is the Claimant and has the authority to collect one half (1/2) of the funds on as evidenced by the attached Affidavit, Death Certificate, Photo ID, Birth Certificate, and copy of Trustees Report of Unclaimed Funds.
- 8. That the applicant has supplied the Court with a valid address, telephone number and copy of his Social Security as required by the Local Rules.
- 9. That No other motion is pending for recovery of the same unclaimed funds.
- 10. Applicant has complied fully with the requirements of 28 USC 2042
- 11. Max Bryant, as applicant respectfully request that this Court release \$3,348.60 of the Unclaimed Funds on deposit with the United States Treasury.

This 11<sup>th</sup> Day of June, 2014

## /S/ HOWARD G. PICK\_

Howard G. Pick # 07686 Post Office Box 3285 Crossville, TN 38557 (931)456-8999 (931) 456-8989 fax **HGPICK@CITLINK.NET** 

## CERTIFICATE OF SERVICE

I hereby certify that on the 13<sup>th</sup> of May, 2014 I served a copy of the forgoing Notice, Motion and Proposed Order to Withdraw Funds from the Registry of the Court to the US Attorney, 110 Ninth Ave. South, Ste. A-961 Nashville TN 37203; US Trustee, 701 Broadway, Customs House, Ste. 318 Nashville, TN 37203; Chapter 7 Trustee Eva Lemeh, 4300 Kings Lane Nashville, TN 37218 via ECF Electronic Court Mail; and mailed a notice via first class mail to the Debtor and Debtors Attorney(Pro Se) Hanover Corp, LLC One Lakeview Place, 25 Century Blvd. Ste. 208, Nashville, TN. 37218; Max Bryant 5 South St, Randolph, VT 05060.

/S/ Howard G. Pick Howard G. Pick Attorney For Max Bryant